

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA

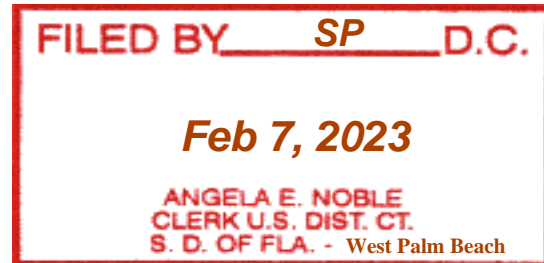
CASE NO. 23-MJ-8062-BER

UNITED STATES OF AMERICA

v.

ROBERT PRESTON BOYLES,

Defendant



CRIMINAL COVER SHEET

1. Did this matter originate from a matter pending in the Central Region of the United States Attorney's Office prior to August 8, 2014 (Mag. Judge Shanick Maynard)? No
2. Did this matter originate from a matter pending in the Northern Region of the United States Attorney's Office prior to October 3, 2019 (Mag. Judge Jared Strauss)? No

Respectfully submitted,

MARKENZIE LAPOINTE
UNITED STATES ATTORNEY

By:

Gregory Schiller

Gregory Schiller
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UNITED STATES DISTRICT COURT

for the

Southern District of Florida

United States of America

v.

ROBERT PRESTON BOYLES

Case No. 23-MJ-8062-BER

Defendant(s)

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of March 2021 through November 2022 in the county of Palm Beach in the
Southern District of Florida, the defendant(s) violated:

Code Section

18 U.S.C. § 2251(d) and (e)

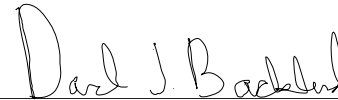
Offense Description

Conspiracy to advertise child pornography

This criminal complaint is based on these facts:

See attached Affidavit

☒ Continued on the attached sheet.



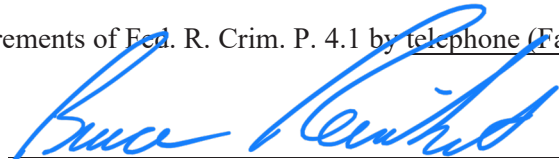
Complainant's signature

FBI Special Agent David J. Backlund

Printed name and title

Subscribed and sworn to before me in accordance with the requirements of Fed. R. Crim. P. 4.1 by telephone (FaceTime).

Date: 02/07/2023



Judge's signature

City and state: West Palm Beach, Florida

United States Magistrate Judge Bruce E. Reinhart

Printed name and title

AFFIDAVIT IN SUPPORT OF CRIMINAL COMPLAINT AND ARREST WARRANT

I, David J. Backlund, a Special Agent with the Federal Bureau of Investigation (“FBI”) being duly sworn, depose and state as follows:

1. I have been employed as a Special Agent of the FBI since September 2008, and am currently assigned to the FBI’s Child Exploitation Operational Unit within the Criminal Investigative Division. As part of my duties as a Special Agent, I am assigned to investigate violations of federal law, including the online exploitation of children. This includes violations pertaining to the illegal trafficking, production, transmission, possession, and receipt of material depicting the sexual exploitation of minors.

2. I am submitting this affidavit in support of a criminal complaint and arrest warrant for ROBERT PRESTON BOYLES (“BOYLES”), year of birth: 1952, social security number: XXX-XX-1466. I submit there is probable cause to believe that beginning at least in or about March 2021, and continuing through in or about November 2022, in the Southern District of Florida and elsewhere, BOYLES conspired with others to advertise child pornography in violation of 18 U.S.C. § 2251(d) and (e). The term “child pornography,” as used in this affidavit, refers to the definition set forth in 18 U.S.C. § 2256(8)(A).

3. Title 18 U.S.C. § 2251(d) and (e) prohibit any person from conspiring to knowingly make, print, or publish, or cause to be made, printed or published, any notice or advertisement seeking or offering to receive, exchange, buy, produce, display, distribute, or reproduce, any visual depiction, if the production of such visual depiction involves the use of a minor engaging in sexually explicit conduct and such visual depiction is of such conduct, when such person knows or has reason to know that such notice or advertisement will be transported using any means or facility of interstate or foreign commerce or in or affecting interstate or foreign commerce by any

means including by computer, or when such notice or advertisement was transported using any means or facility of interstate or foreign commerce or in or affecting interstate commerce by any means including by computer. Here, I submit that there is probable cause that BOYLES violated 18 U.S.C. § 2251(d) and (e) because, as described more fully below, he was a member and facilitator of a website that was dedicated to the advertisement, distribution, and exchange of child pornography, and on which, in accordance with the rules of the website, users advertised and distributed child pornography via notices and advertisements in the form of URL links and descriptive text.

4. The statements contained in this affidavit are based in part on information provided by FBI Special Agents; written reports about this and other investigations that I have received, directly or indirectly, from other law enforcement agents; information gathered from the service of administrative subpoenas; the results of physical and electronic surveillance conducted by law enforcement agents; independent investigation and analysis by FBI agents and computer forensic professionals; and my experience, training and background as a Special Agent with the FBI. Since this affidavit is being submitted for the purpose of securing a criminal complaint and arrest warrant, I have not included each and every fact known to me concerning this investigation. I have set forth only the facts that I believe are necessary to establish probable cause to believe BOYLES has violated 18 U.S.C. § 2251(d) and (e).

5. The FBI is investigating a website (hereinafter referred to as the “TARGET WEBSITE”) that allowed users to engage in online communications with other users until it stopped operating in approximately November 2022. Users of the TARGET WEBSITE trafficked in child pornography images and videos via the posting of web links within messages. These links allowed a user to navigate to another website, such as a file-hosting website, where images and/or

videos were stored in order to download these images and videos. When posting the links, users of the TARGET WEBSITE also generally included descriptive text that provided information about the sexual acts and age and gender of the child victim depicted in the linked-to child pornography files. The TARGET WEBSITE provided rules that instructed users to share child pornography in this manner. The TARGET WEBSITE consisted of at least 100 registered members. Registered members of the TARGET WEBSITE, and any user with a higher status than registered member, all had their usernames reserved for their exclusive use and had to access their accounts through passwords chosen by the users. Usernames that were taken by registered members or users of higher status could not be used by any other website user. Until approximately July 2022, a high-ranking administrator of the TARGET WEBSITE resided in Palm Beach County, Florida, within the Southern District of Florida, and advertised child pornography and took acts to help manage the website from his home.

6. FBI investigation has further revealed that another particular user of the TARGET WEBSITE, acting under a particular online alias and referred to here as the "SUBJECT USER," acted in a position of leadership on the website. According to communications made over the TARGET WEBSITE, the SUBJECT USER corrected the formatting of child-pornography postings made by other users to adhere to the TARGET WEBSITE's rules, moderated user behavior, and provided advice to other users on how to attain greater status on the TARGET WEBSITE and avoid law enforcement detection. The FBI has further determined that the SUBJECT USER had been active as a registered user on the TARGET WEBSITE from at least March 2021 until the website ceased operating in November 2022.

7. The FBI's investigation further revealed that the SUBJECT USER has also shared URL links to child pornography via the TARGET WEBSITE that were accessible to numerous

other TARGET WEBSITE users. Below are examples of some of the links shared by the SUBJECT USER:

a. On or about March 30, 2022, the SUBJECT USER shared a link alongside descriptive text indicating that the linked-to child pornography files included 26 images, the majority of which depicted nude “girls” posing. The link redirected to another website that contained an album of 26 images of prepubescent girls, several of who were nude and engaged in sexual acts with adult men or posing provocatively. In one image, a girl estimated to be between the ages of four and seven is performing oral sex on an adult man’s erect penis. In another image, a girl estimated to be between the ages of three and five is inserting a phallic sex toy into her anus. The girls engaged in sexual acts have no noticeable pubic hair or breast development and young facial and bodily features.

b. On or about November 2, 2022, the SUBJECT USER shared a link alongside descriptive text indicating that the linked-to child pornography files included 9 images of “girls” posing. The link redirected to another website that contained an album of nine images of prepubescent girls engaging in sex acts with adult males or posing in positions that exposed their vaginas and/or anuses. In one of the images, an adult man has his erect penis inserted into the anus of a girl who is estimated to be between the ages of five and seven. In another, a girl estimated to be between the ages of six and eight is performing oral sex on an adult man’s erect penis. The girls engaged in sexual acts have no noticeable pubic hair or breast development and young facial and bodily features.

IDENTIFICATION OF ROBERT BOYLES AS THE SUBJECT USER

8. On or about February 7, 2023, the FBI executed a search warrant authorized by the U.S. District Court for the Middle District of Tennessee at BOYLE's residence in Clarkesville, Tennessee. BOYLES and his wife (year of birth: 1956) were the only two individuals present and no one else appeared to reside at the home. During the execution of the search warrant, after being advised of his rights, BOYLES was asked about accessing the TARGET WEBSITE and stated that he had tried to quit but was addicted to it.

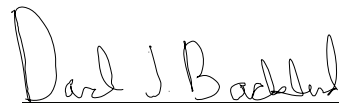
9. During the execution of the search warrant, FBI agents also discovered extensive evidence of BOYLES's involvement with the TARGET WEBSITE. For example, within an office in BOYLES's home, the FBI located a laptop with the username "Robert Boyles" and containing documents related to BOYLES. A thumb drive was plugged into the laptop, and an on-scene examination of the thumb drive uncovered a text file containing a description of a user profile that identified the SUBJECT USER's unique username and described the user's sexual interests. This description matches the SUBJECT USER's profile that was available on the TARGET WEBSITE while it was operational. The FBI also found two folders on the thumb drive, the titles of which contained the SUBJECT USER's unique username, as well as images of what appeared to be clothed, prepubescent minors posed in a sexual manner. Additionally, the FBI found saved on the thumb drive multiple hyperlinks to file-hosting websites and other active websites known to be dedicated to sharing child pornography and discussing child sexual abuse. The hyperlinks to the file-hosting websites were still active and accessible at the time of the search. Many of the hyperlinks directed to a file-hosting website that was frequently used by individuals to share child pornography on the TARGET WEBSITE. FBI agents accessed several of those links during the search and observed that some of them directed to files of nude minors exposing their genitals.

10. Additional examination of the thumb drive uncovered child pornography that had been deleted but was still recoverable on the device, including a video of a nude prepubescent female who is estimated to be between the ages of seven and nine performing oral sex on an adult female.

CONCLUSION

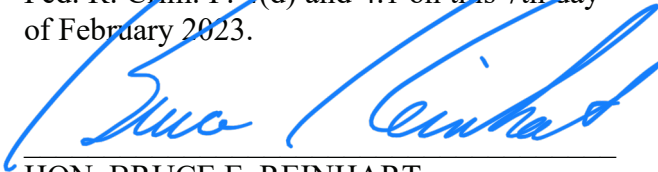
11. For these reasons, your Affiant respectfully submits that there is probable cause to believe that ROBERT PRESTON BOYLES violated 18 U.S.C. § 2251(d) and (e) within the Southern District of Florida and elsewhere by conspiring with others to advertise child pornography. I therefore respectfully request that the Court authorize a criminal complaint and arrest warrant for BOYLES.

Respectfully submitted,



David J. Backlund
Special Agent
Federal Bureau of Investigation

Subscribed and sworn to me by applicant by telephone (Facetime) per the requirements of Fed. R. Crim. P. 4(d) and 4.1 on this 7th day of February 2023.



HON. BRUCE E. REINHART
UNITED STATES MAGISTRATE JUDGE

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA

PENALTY SHEET

Defendant's Name: ROBERT PRESTON BOYLES

Case No: 23-MJ-8062-BER

Count #1:

Conspiracy to advertise child pornography

18 U.S.C. § 2251(d) and (e)

* **Max. Term of Imprisonment:** 30 years

* **Mandatory Min. Term of Imprisonment (if applicable):** 15 years

* **Max. Supervised Release:** Life (mandatory minimum term of 5 years)

* **Max. Fine:** \$250,000 fine and a \$5,000 special assessment

*Refers only to possible term of incarceration, supervised release and fines. It does not include restitution, special assessments, parole terms, or forfeitures that may be applicable.